

LAUREN M. BLAS, SBN 296823
LBlas@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, California 90071
Telephone: 213.229.7000
Facsimile: 213.229.7520

GEOFFREY SIGLER (*pro hac vice*)
GSigler@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Telephone: 202.995.8500
Facsimile: 202.467.0539

Attorneys for Defendants
UNITED BEHAVIORAL HEALTH and
UNITED HEALTHCARE INSURANCE
COMPANY

MATTHEW M. LAVIN (*pro hac vice*)
Matt.Lavin@agg.com
AARON R. MODIANO (*pro hac vice*)
Aaron.Modiano@agg.com
ARNALL GOLDEN GREGORY LLP
1775 Pennsylvania Ave NW, Suite 1000
Washington, DC 20006
Telephone: 202.677.4030
Facsimile: 202.677.4031

DAVID M. LILIENSTEIN, SBN 218923
david@dlawgroup.com
KATIE J. SPIELMAN, SBN 252209
katie@dlawgroup.com
DL LAW GROUP
345 Franklin Street
San Francisco, CA 94102
Telephone: 415. 678.5050
Facsimile: 415.358.8484

Attorneys for PLAINTIFFS

[ADDITIONAL COUNSEL LISTED
ON SIGNATURE PAGE]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LD, DB, BW, and CJ, on behalf of themselves
and others similarly situated,

Plaintiffs,

v.

UNITED BEHAVIORAL HEALTH, a
California Corporation, UNITED
HEALTHCARE INSURANCE COMPANY, a
Connecticut Corporation, and MULTIPLAN,
INC., a New York Corporation,

Defendants.

CASE NO. 4:20-cv-02254-YGR

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE CERTAIN CASE
DEADLINES PER L.R. 6-2**

Hon. Yvonne Gonzalez Rogers

Complaint filed: April 2, 2020

Third Amended Complaint filed: Sept. 10, 2021

1 Plaintiffs LD, DB, BW, RH and CJ, United Behavioral Health and UnitedHealth Insurance
 2 Company (“United Defendants”) and MultiPlan, Inc. (“MultiPlan”), collectively the “Parties,” to the
 3 above-entitled action jointly submit this stipulation pursuant to Civil Local Rule 6-2. In further support
 4 of this Stipulation, the Parties state as follows:

5 **WHEREAS**, on June 23, 2023, this Court issued its Scheduling and Pretrial Order setting a
 6 deadline for disclosure of Plaintiffs’ Opening Expert Reports for July 31, 2023 (Dkt. 319 at 1); a
 7 deadline for disclosure of Defendants’ Responsive Expert Reports for September 15, 2023 (Dkt. 319
 8 at 1); a deadline for disclosure of Plaintiffs’ Rebuttal Reports, if any, for October 6, 2023 (Dkt. 319 at
 9 1); and an Expert Discovery Cutoff for November 10, 2023 (Dkt. 319 at 1);

10 **WHEREAS**, Plaintiffs served their Opening Expert Reports on July 31, 2023, and Defendants
 11 need the opportunity to depose each of Plaintiffs’ experts before serving responsive reports;

12 **WHEREAS**, some of Plaintiffs’ experts have limited availability, and counsel for MultiPlan
 13 has significant scheduling conflicts in the months of August and September 2023;

14 **WHEREAS**, the Parties have met and conferred and agreed to continue the deadlines for
 15 Defendants’ Responsive Expert Reports from September 15, 2023 to September 26, 2023, to continue
 16 the deadline for Plaintiffs’ Rebuttal Reports, if any, from October 6, 2023 to October 20, 2023, and to
 17 continue the Expert Discovery Cutoff from November 10, 2023 to November 14, 2023;

18 **WHEREAS**, the continuance of the above deadlines will not in any way affect any of the other
 19 deadlines in the case, such as the deadlines for dispositive motions, pre-trial or trial dates;

20 **NOW, THEREFORE**, subject to the approval of the Court, and for good cause shown, the
 21 Parties hereby stipulate and agree as follows:

22 The deadline for disclosure of Defendants’ Responsive Expert Reports currently scheduled for
 23 September 15, 2023 is continued to September 26, 2023. The deadline for disclosure of Plaintiffs’
 24 Rebuttal Reports, if any, currently scheduled for October 6, 2023 is continued to October 20, 2023.
 25 The Expert Discovery Cutoff currently scheduled for November 10, 2023 is continued to November
 26 14, 2023. All other deadlines in the Court’s Scheduling and Pretrial Order (Dkt. 319) shall remain
 27 unchanged.
 28

1 **IT IS SO STIPULATED.**

2 DATED: August 31, 2023

Respectfully submitted,

3 GIBSON, DUNN & CRUTCHER LLP

4
5 By: /s/ Geoffrey Sigler

Geoffrey Sigler

6 Attorneys for Defendants UNITED
7 BEHAVIORAL HEALTH and UNITED
8 HEALTHCARE INSURANCE COMPANY

9 DATED: August 31, 2023

PHELPS DUNBAR LLP

10
11 By: /s/ Errol King

Errol King

12 Attorneys for Defendant MULTIPLAN, INC.

13 ERROL J. KING, JR. (*admitted pro hac vice*)
14 PHELPS DUNBAR LLP
15 II City Plaza, 400 Convention Street, Suite 1100
16 Baton Rouge, Louisiana 70802
17 Telephone: (225) 376-0207
18 Facsimile: (225) 381-9197
19 Errol.King@phelps.com

20
21 Dated: August 31, 2023

ARNALL GOLDEN GREGORY LLP

22
23 By: /s/ Matthew Lavin

Matthew M. Lavin

24
25 Dated: August 31, 2023

DL LAW GROUP

26
27 By: /s/ David Lilienstein

David Lilienstein

28 Attorneys for PLAINTIFFS


[~~PROPOSED~~] ORDER

Having considered the Parties' Joint Stipulation and [Proposed] Order, the Court HEREBY ORDERS as follows:

The deadline for disclosure of Defendants' Responsive Expert Reports currently scheduled for September 15, 2023 is continued to September 26, 2023. The deadline for disclosure of Plaintiffs' Rebuttal Reports, if any, currently scheduled for October 6, 2023 is continued to October 20, 2023. The Expert Discovery Cutoff currently scheduled for November 10, 2023 is continued to November 14, 2023. All other deadlines in the Court's Scheduling and Pretrial Order (Dkt. 319) shall remain unchanged.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 1, 2023


The Hon. Yvonne Gonzalez Rogers
UNITED STATES DISTRICT COURT JUDGE

ATTESTATION PURSUANT TO LOCAL RULE 5-1

I, Geoffrey Sigler, am the ECF user whose identification and password are being used to file this document. Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that concurrence in the filing of this document has been obtained from the other signatories hereto.

Dated: August 31, 2023

/s/ Geoffrey Sigler

Geoffrey Sigler